

# Exhibit EE

**JAMES J. PETTIT  
LOCKS LAW FIRM**

**DIGITEK**

**JANUARY 19, 2010**

I filed a class action for economic loss arising out of Digitek ingestion, in state court in New Jersey, which was removed to federal court and transferred to the MDL. I am a court-appointed member of the Plaintiff Steering Committee in the MDL. I have personally propounded written discovery on defendants in Digitek litigation in state court in New Jersey (where I represent a number of personal injury clients), and separate and distinct class action discovery in the MDL. (That is, I drafted it and Lead Counsel served it.) I am on the document review team and I have reviewed tens of thousands of pages of documents. I am on the team that prepares for "corporate liability" discovery depositions and then conducts those depositions. I have questioned a Vice-President of Actavis, and was about to question the former Director of Manufacturing Operations, when the first day session ended. (Day Two is being scheduled.) I will depose the Director of Quality Assurance in a few days. I will depose other witnesses in the coming weeks. I am on the Class Action Committee and have participated on the Committee for months.

## **GENERAL**

I was personally selected by fellow plaintiffs' counsel as co-lead trial counsel in Vadino v. Wyeth, the Diet Drug Class Action jury trial in New Jersey. This was an eight week jury trial in 1999 of a medical monitoring state-wide class action.

I am the court-appointed Lead Counsel (in 2007) for plaintiffs in a class action involving children exposed to mercury (Adair v Jim Sullivan, Inc., et al; a/k/a Kiddie Kollege Daycare litigation in New Jersey). I was formerly named by the Mass Tort Court in 2001 as New Jersey state-wide Liaison Counsel for all plaintiffs in In Re: PPA Litigation. I was co-chair of the state-wide Discovery Committee for In Re: Propulsid Litigation in New Jersey. I have handled mass tort litigation in four (4) states (federal and state court) since 1980. In addition, the Locks Law Firm has a national reputation for prosecuting class actions, as well as matters involving complex and sophisticated scientific/medical issues. As Managing Partner of Locks Law Firm's New Jersey office, I have the appropriate staffing to ensure proper pursuit of this Digitek litigation, and I have the time and energy available to be Co-Lead Counsel for the class action.

I am a 1973 graduate of Temple University located in Philadelphia, Pennsylvania. I received my law degree in 1980 for Loyola Law School in Los Angeles, California. My bar admissions include California, Pennsylvania and New Jersey and I am in good standing on all of these states. I am admitted in the following federal courts: Central District, California; Eastern District, Pennsylvania; District of New Jersey; Third Circuit Court of Appeals; Fourth Circuit Court of Appeals; United States Supreme Court.

My experience and appointments demonstrate my ability to work cooperatively with other lawyers, and my ability to handle the work required by this Court to prosecute the class action in Digitek litigation.